



Privacy Statement for Employees of FD Mediagroep

1. Introduction

In this Privacy Statement, we describe how and for what purposes FD Mediagroep processes personal data of its employees and outline the privacy rights of these employees.

In this context, FD Mediagroep refers to the company FD Mediagroep B.V., located at Prins Bernhardplein 173, 1097 BL Amsterdam, and all its 100% subsidiaries in the Netherlands, currently including Het Financieele Dagblad B.V., Business Nieuws Holding B.V., FD Business B.V., and Company.info B.V.; hereinafter referred to as "we."

For the purpose of this statement, an employee is anyone employed or formerly employed by us, including applicants, freelancers, interns, temporary workers, and seconded personnel; hereinafter collectively referred to as "you."

The definitions of 'personal data' and 'processing' adhere to the General Data Protection Regulation (GDPR), as elaborated below.

This Privacy Statement was last updated on September 1, 2023. In case of any substantial change, we will communicate that to everyone. The latest version of this Privacy Statement is always available on Afas Insite under HR-information.

2. When does this Privacy Statement apply?

This Privacy Statement applies to all processing of your personal data by us. To clarify, this statement does not cover the processing of personal data of customers, subscribers, and business relations.

3. Who is responsible for processing your personal data?

We are responsible for the processing of your personal data, even if we enlist third parties (referred to as 'processors' in GDPR terms); further details on this will be provided later. This also means that you can always reach out to us with any questions or complaints. Feel free to send us an email at privacy@fdmediagroep.nl for this purpose. You can also use this address to contact our Data Protection Officer.

4. What personal data does FD Mediagroep process?

Depending on the purpose, as outlined in section 5 below, we may process the following personal data of you:

- Identification data: such as first and last name, a copy of your ID, and your employee number./
- Professional data: information about your career;
- Contact details: such as residential address and email address;
- Data about partners and children: including names, birthdates, and contact details;
- Background data: such as a Certificate of Good Conduct ('Verklaring Omtrent Gedrag', VOG);
- Financial data: such as your bank account number;



- Demographic information: including age and gender;
- Special categories of personal data: such as your Social Security Number (BSN) and absence data.

If you are employed by us, we may also process personal data of your partner and dependents in some cases, for example, for pension administration purposes.

5. For what purposes does FD Mediagroep process your personal data?

We process your personal data for various purposes, using only data limited to what is necessary for each specific purpose.

5.1 Recruitment, selection, and screening

If you apply for a position with us, we obtain the personal data you provide during the application process. We store this information to decide whether to invite you for an interview and, hopefully, offer you a job.

As part of the selection process, we can conduct assessments to evaluate your skills and knowledge. Depending on the nature of the position you have applied for and the related business risks, we may also assess your reliability and integrity as a future employee. For this purpose, we often engage an external company. This company may, for instance, verify your Curriculum Vitae, diplomas, and your social media profile (such as LinkedIn). We might also request you to provide a Certificate of Good Conduct ('Verklaring Omtrent Gedrag', VOG).

We process your personal data in the recruitment, selection, and screening process, as well as in our communication with you, only to the extent necessary for those specific purposes.

The legal basis for processing your data in these processes is 'legitimate interest' (Art. 6(1)(f) GDPR) and our fulfillment of obligations towards you (Art. 6(1)(b) GDPR).

We retain your application data for up to four weeks after the conclusion of the recruitment process unless you give us permission to extend the retention period to a maximum of one year to potentially inform you of future job opportunities. After this period, your data will be deleted from our systems unless you have joined our company during that time.

5.2 Other HR-related purposes

We process personal data of all employees to facilitate salary payments, compensation for assignments, etc. This category also includes any expense reimbursements (including travel expenses) and, if applicable, pension administration. For this purpose, we use, among other things, contact information, bank details, age, and your Social Security Number (BSN).

If you are employed by us, we also process your personal data to create and manage an employee file, including information about your absenteeism (type and duration). We do not have medical data about you.

Furthermore, we process your personal data when we offer you education, training, and other development opportunities. We also keep records of these in your personnel file. Finally, the personnel file includes reports from performance reviews, leave requests, and other HR-related communications.

Personal data related to salary payments, including a copy of your ID and our tax declaration regarding you, is retained for up to seven years after the end of the employment contract or, in the

case of a freelancer, seven years after the completion of the assignment, as required by tax regulations.

Personal data in the employee file that does not pertain to financial matters is retained for a maximum of two years after the end of the employment contract. After this period, the data is destroyed.

Data related to training is deleted two weeks after you have left the company. Data required only for our own insurance purposes is deleted immediately after termination of your contract.

We process this personal data based on the legal basis of the need for contract performance with you (Art. 6(1)(b) GDPR), legal obligations, such as tax payments (Art. 6(1)(c) GDPR), or our 'legitimate interest' (Art. 6(1)(f) GDPR) in the case of training or if you support us as a temporary worker or intern.

We do not use your personal data for profiling or other forms of automated decision-making.

If we receive a request from a third party, such as a potential new employer, for your data as part of a legitimate screening process, we only provide information about your position(s) with us, the duration of employment, and our assessment of your reliability and integrity.

5.3 Communication and business operations

Employees at our company use various computer systems. Additionally, you will inevitably participate in digital communication with colleagues, clients, and third parties regularly. During these activities, your personal data, such as your name, contact details, browsing information, and login details, are stored and processed. We may also use your residential address, email address, and/or private phone number(s) to communicate with you.

As the data controller in all these processes, we process your data based on the legal basis of 'legitimate interest' (Art. 6(1)(f) GDPR). This data, such as your business email address, is deleted after your departure from our company or the termination of your freelance assignment.

5.4 Protecting interests and compliance with rules

We prioritize your health and the safety of our office spaces. We process your personal data to restrict access to office spaces to those who require it. Based on your 'access pass,' we can track who has entered which building of FD Mediagroep. We use camera surveillance to monitor access to our premises but do not employ cameras in the workplace.

We also monitor our networks and systems to ensure compliance with our policies and rules. We may do this if you use our equipment, information, networks, or systems. For this purpose, we use personal data such as device information (such as MAC address), browsing information, login details, and log files.

In exceptional cases, we may individually monitor employees. We only do this if we receive signals of highly questionable use of systems or company assets. If an employee is suspected of behavior or actions that may violate our policies, we may initiate an internal investigation. These reasons might be suspicions of fraud or a transfer of trade secrets, confidential information, intellectual property, or know-how, or if the employee is suspected to be the source of a computer virus, spam, or any other type of hack of the company systems. Only the Executive Board of FD Mediagroep can decide to conduct such an internal investigation. In doing so, the Executive Board considers that any infringement on the privacy of an employee must be justified by a legitimate interest of our company that outweighs the privacy of that employee.

For this purpose, we may process personal data such as your account and profile information, internet usage, sent and received email messages, (printed) documents, hard drives (USB-sticks, portable hard drives), backups, mobile network, and telecom information.

The personal data of employees who file a complaint based on the Complaints Procedure and the data of those who are the subject of such a complaint are processed and stored within the limits of the GDPR in the Register of the Complaints Committee.

We retain this personal data for up to 6 months after the end of the employment or termination of the assignment unless you are the subject of an internal or external investigation or a legal proceeding. In that case, we retain the relevant personal data until the investigation or legal proceeding is concluded.

We process this personal data based on our 'legitimate interest' (Art. 6(1)(f) GDPR).

6. How does FD Mediagroep obtain your personal data?

We usually obtain your personal data directly from you, for example, because you provided this information when you joined the company or when logging into various computer systems. In some cases, we may also receive your personal data from third parties, such as government agencies, including the tax authorities.

7. With whom is your personal data shared?

We do not share your personal data with third parties outside FD Mediagroep, unless:

- (i) We are legally obligated to do so, for example, in the case of the tax authorities.
- (ii) We are obligated to do so under the terms of the employment contract (or contract for services) that we have entered into with you.
- (iii) It involves a third party to whom we have outsourced certain processing activities and who acts on our behalf (in GDPR terms: a data processor).
- (iv) Disclosure of your personal data is necessary for our business operations, such as the publication of your name or portrait in connection with an article on one of our websites.

Within FD Mediagroep, only employees who need access to your personal data due to their function have access, and only to the extent absolutely necessary to perform their duties. In practice, this usually includes HR colleagues, your supervisor, and their supervisor.

If we engage a data processor to process your data (see iii), it is always done based on our instructions and requirements. There is always an agreement with that party. One of the requirements is that the processor commits to complying with the GDPR and maintains at least the same level of security for your data as we do (see below). In any case, the processing of your data remains our responsibility, even if we engage another party/processor for it.

The potential disclosure of your personal data in the context of our business operations (see iv) may also involve sharing your data, if necessary, with third parties such as independent auditors, business partners, service providers, and/or companies which assist us in carrying out our activities. In this context, we may also share your data in the case of a merger or acquisition, to respond to a request from a government agency, or if necessary for a business audit or to investigate or respond to a complaint or security threat. This category also includes a request from a third party, such as an insurance company, if we seek compensation for a claim on any grounds.

Parties that may have access to your data to provide their products or services to us may include, for example:

- pension funds

- staffing agencies
- occupational health and safety services
- training institutions
- software vendors such as TopDesk and AFAS.

In all these cases, as in any other situation where we share your data with third parties, we ensure that these third parties receive no more data than absolutely necessary.

8. Where does FD Mediagroep store your personal data?

We store your personal data on servers in the European Union as much as possible. For this purpose, we may use parties with headquarters in the United States, such as Amazon and Microsoft. Even in those cases, we contractually ensure that these parties comply with the requirements for international data transfers under the GDPR.

9. How is your personal data secured?

We implement appropriate technical, physical, and organizational measures to protect your personal data against data breaches and similar incidents. This includes having a privacy policy, being ISO27001 certified, and implementing various security measures and protocols to prevent data breaches and similar incidents.

10. How long does FD Mediagroep retain your personal data?

We delete your personal data or anonymize it, as described above in section 5. In practice, this means that we delete (or anonymize) your data when we no longer need it for the purposes for which the data was collected, and it is legally permissible to destroy that information.

11. What are your rights?

You have the right, under certain conditions, to access, rectify, and possibly delete your personal data. You also have the right to request us to restrict processing, object to certain processing activities, and we are obliged, if desired, to transfer our personal data about you to you.

If you wish to exercise any of these rights, please send an email to privacy@fdmediagroep.nl, preferably with some motivation. Be aware that we may ask for additional information to verify your identity.

12. Who can you contact for complaints or questions?

If you have a complaint about how we handle your personal data, you can contact the Autoriteit Persoonsgegevens (Dutch Data Protection Authority). Alternatively, you can always reach out to our Data Protection Officer at privacy@fdmediagroep.nl. He/she is also available for any questions you may have after reading this Privacy Statement, so feel free to reach out.